UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

MICHAEL WATSON, INDIVIDUALLY, AND AS FATHER AND NEXT FRIEND OF JOHN WATSON, PPA Plaintiff

Civil Action No. 04-11782 DPW

٧.

PARTNER INDUSTRIAL PRODUCTS Defendant

LOCAL RULE 16.1 CERTIFICATION

The undersigned hereby affirm that they have conferred with a view to establishing, insofar as it is possible at this preliminary stage, a budget for the cost of conducting the full course - and various alternative courses - of the litigation; and to consider the resolution of the litigation through the use of Alternative Dispute Resolution programs.

> ELECTROLUX PROFESSIONAL OUTDOOR PRODUCTS, INC.

Lawrence G. Muscarella, Esquire

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Dated: September 22, 2004